

1 DANIEL G. BOGDEN  
United States Attorney  
2 CRANE M. POMERANTZ  
Assistant United States Attorneys  
3 333 South Las Vegas Blvd., Suite 5000  
Las Vegas, Nevada 89101  
4 (702) 388-6336

5 UNITED STATES DISTRICT COURT  
6 DISTRICT OF NEVADA

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8 UNITED STATES OF AMERICA, ) Case No.: 2:16-cr-00043-GMN-CWH  
9 Plaintiff, )  
10 vs. ) STIPULATION FOR PROTECTIVE ORDER  
11 ABDALLAH D. HAMEY, )  
12 Defendant. )

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13 It is stipulated and agreed between the undersigned counsel that this Court issue an Order  
14 protecting from disclosure to the public any discovery documents containing the personal  
15 identifying information such as social security numbers, drivers' license numbers, dates of birth,  
16 or addresses, of participants, witnesses and victims in this case. Such documents shall be  
17 referred to hereinafter as "Protected Documents." The parties state as follows:  
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19 1. Protected Documents which will be used by the government in its case in chief  
20 include personal identifiers, including social security numbers, drivers' license numbers, dates of  
21 birth, and addresses, of participants, witnesses, and victims in this case.

22 2. Discovery in this case is estimated to be more than two thousand pages in length.  
23 Given the nature of the allegations and the facts and circumstances surrounding the crimes with  
24 which the defendants are charged, that is, that the defendants assumed identities of persons other

1 than themselves, and obtained identity documents bearing the defendants' photograph in the  
2 victims' names and personal identifiers, many of the documents in the discovery necessarily  
3 include personal identifiers. Redacting the personal identifiers of participants, witnesses, and  
4 victims would prevent the timely disclosure of discovery to defendant.

5           3. The United States agrees to provide Protected Documents without redacting the  
6 personal identifiers of participants, witnesses, and victims.

7       4. Access to Protected Documents will be restricted to persons authorized by the  
8 Court, namely defendants, attorneys of record and attorneys' paralegals, investigators, experts,  
9 and secretaries employed by the attorneys of record and performing on behalf of defendant.

10       5. The following restrictions will be placed on defendant, defendants' attorneys and  
11 the above-designated individuals unless and until further ordered by the Court. Defendants,  
12 defendants' attorneys and the above-designated individuals shall not:

13                   a.       make copies for, or allow copies of any kind to be made by any other  
14 person of Protected Documents;

b. allow any other person to read Protected Documents; and

16                   c.       use Protected Documents for any other purpose other than preparing to  
17 defend against the charges in the Indictment or any further superseding indictment arising out of  
18 this case.

19       6. Defendants' attorneys shall inform any person to whom disclosure may be made  
20 pursuant to this order of the existence and terms of this Court's order.

21       7. The requested restrictions shall not restrict the use or introduction as evidence of  
22 discovery documents containing personal identifying information such as social security  
23 numbers, drivers' license numbers, dates of birth, and addresses during the trial of this matter.

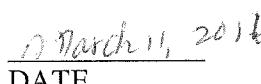
1       8. Upon conclusion of this action, defendants' attorneys shall return to government  
2 counsel or destroy and certify to government counsel the destruction of all discovery documents  
3 containing personal identifying information such as social security numbers, drivers' license  
4 numbers, dates of birth, and addresses within a reasonable time, not to exceed thirty days after  
5 the last appeal is final.

6 DANIEL G. BOGDEN  
United States Attorney  
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8       /s/  
9 CRANE M. POMERANTZ  
Assistant United States Attorney

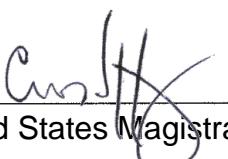
10        
11 MICHAEL SANFT, ESQ.  
Counsel for defendant Hamey

March 11, 2016  
DATE

  
DATE

12  
13 ORDER

14 IT IS SO ORDERED.

15        
16 United States Magistrate Judge  
17 DATED: March 14, 2016

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